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**MEMORANDUM**

TO: Local Boards of Health

FROM: Howard S. Wensley, MS, CHO  
Director

DATE: December 23, 2002

SUBJECT: Municipal Sharps Collection Program

Both the Departments of Public Health and Environmental Protection are receiving an increasing number of inquiries from homeowners, boards of health and solid waste haulers with regard to the proper disposal of household generated sharps. As you are probably aware the disposal of sharps originating in private residences is not regulated as medical waste under 105 CMR 480.000 and may be disposed of along with the municipal solid waste (MSW). It has been recommended that the disposal of sharps in the MSW be accomplished by placing them in rigid containers such as coffee cans or liquid laundry detergent bottles, labeled as "Not for Recycling" and disposed of with the routine rubbish.

According to the Coalition for Safe Community Needle Disposal (CSND), each year 8-million syringe users will administer 2 -3 billion injections outside of traditional health care facilities. Whereas most sharps are discarded into the public solid waste system, MAW handlers, barrel pickers and others are at risk. Each needlestick injury results in significant cost for providing post-injury counseling and prevention measures. The number of such injuries outside of the health care setting is not known, however problems that can occur from unsafely discarded used sharps include physical injury and potentially fatal blood borne infections such as HIV and

hepatitis B and C<sup>1</sup>. We are beginning to hear from the waste haulers, boards of health and public works departments that many new MSW contracts will prohibit the disposal of sharps at the curb.

The Departments of Public Health and Environmental Protection along with CSND encourage communities to review the current options for safe disposal of used sharps generated in the community and to plan and develop safe disposal options. The goal of this effort is to create an economical and workable system within each municipality (or several municipalities) for the safe disposal of household sharps.

In order to assist municipalities in establishing community-wide sharps collection programs the Department of Environmental Protection issued an Interim Guidance for a Pilot Program for the Management of Sharps Generated from Certain Non-Commercial Sources ([www.state.ma.us/dep/bwp/dmhl/files/sharpes.doc](http://www.state.ma.us/dep/bwp/dmhl/files/sharpes.doc)). This guidance document provides for flexibility from the site assignment/transfer station requirements of 310 CMR 16.00 and 19.000 by waiving those requirements for sharps collection programs that are operated in accordance with the conditions provided in this guidance document. This guidance allows for the collection of spent sharps generated from non-commercial sources, in-home medical use and discarded sharps collected by public health and public safety personnel to be collected in locations such as pharmacies, medical facilities and municipal facilities.

Boards of Health are urged to investigate the possibility of developing a community-wide sharps collection programs. You should make inquiry of local pharmacies or medical facilities to determine whether they are willing to serve as the collection point. Some municipalities have chosen to locate the depository at a fire station because it is generally staffed 24/7 and may also house EMS staff. It could also be located at the Board of Health office.

Some communities in Massachusetts already have a centralized sharps collection programs in-place, as do many out-of-state jurisdictions. The cost for developing such programs should be relatively small, consisting of the initial cost of the storage container at the drop-off site and for the actual disposal at an infectious waste treatment facility. These costs may be offset by a small user fee, from donations from your MSW hauler, who is very interested in removing these hazards from the waste that they handle, and possibly from a philanthropic medical waste handling/treatment firm.

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<sup>1</sup> The Coalition for Safe Community Needle Disposal consists of the American Medical Association, The Association of State and Territorial Health Officers, American Pharmaceutical Association, American Diabetes Association, National Alliance of State and Territorial AIDS Directors and the American Association of Diabetes Educators (1-800-643-1643) or [www.safeneedledisposal.org](http://www.safeneedledisposal.org).